

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D.)
BROWN, DEONTAE TATE, JEREMY S.)
MELTON, ISSACCA POWELL, KEITH)
BURGESS, TRAVIS BOYD,)
TERRENCE DRAIN and KIMBERLY)
ALLEN on behalf of themselves and)
all similarly situated persons,)

Plaintiffs,)

v.)

Civil Action No. 2:16-cv-02907-SHM-tmp
Jury Demanded

BILL OLDHAM, in his individual capacity)
as former Sheriff of Shelby County,)
Tennessee; et al.)

Defendants.)

**NOTICE OF FILING REGARDING
PLAINTIFFS' PROPOSAL TO REVISE ESI PROTOCOL**

Per the Court's instruction at the Telephonic Status Conference held on June 25, 2019, the Shelby County Defendants¹ hereby file the following documents:

1. A redline comparison of the Plaintiffs' initial ESI search terms referenced in the Court's Order of March 19, 2019, and the revised terms proposed by Plaintiffs on June 19, 2019, attached hereto as Exhibit 1; and
2. Email correspondence between Byron N. Brown IV and William E. Routt (copied to counsel for all parties) regarding the Plaintiffs' proposal to revise their search terms and

¹ "Shelby County Defendants" include Shelby County, Tennessee, and the following individuals named in their individual and/or official capacities: Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, and Tiffany Ward.

the ESI review process set forth in the Court's Order of March 19, 2019, attached hereto as Exhibit 2.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing is being filed via the Court's ECF system this 25th day of June, 2019, for service on all persons registered in connection with this case, including:

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